

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re:)	
)	
CARI CONKLIN,)	Case No.: 09-30201
SS#: 4110,)	
Debtor.)	Chapter 7
and)	
)	
BEST BUY,)	
Creditor.)	

MOTION FOR REDEMPTION UNDER 11 USC 722

Now Comes the Debtor by and through her attorney, William A. Mueller, and moves the Court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds.

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows:

Sony Laptop Computer

2. The interest of the Debtor in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the “redemption value”, should be determined to be not more than \$100.00.
4. Arrangements have been made by the Debtor to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.

WHEREFORE, the Debtor requests the Court to order the said creditor to accept from the Debtor the lump sum payment of the redemption value within 30 days of the order granting this motion, and release their lien of record. In the event the said Creditor objects to this motion, the Debtor requests the Court to determine the value of the property as of the time of the hearing on such objection.

CARI CONKLIN,

By: /s/ William A. Mueller
William A. Mueller #06187732
Michael K. Read #06238993
Rachel A. Hill - # 51818
Attorneys for the Debtor
The Bankruptcy Center
5312 West Main Street
Belleville, IL 62226
618-236-7000

**NOTICE OF ELECTRONIC FILING AND
CERTIFICATE OF SERVICE BY MAIL**

STATE OF ILLINOIS)		Case No.: 09-30201
)	SS	
CITY OF BELLEVILLE)		Chapter 7

Rachel Woolever, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age, and resides in Madison County, Illinois.

On March 18, 2009, Deponent electronically filed with the Clerk of the U. S. Bankruptcy Court the **Motion for Redemption Under 11 USC 722.**

The Deponent served electronically the **Motion for Redemption Under 11 USC 722** to the following parties:

US Trustee

US Bankruptcy Court

Donald Samson

and served by mail to the following parties:

Cari Conklin	Bass & Associates	Best Buy
520 N. Vernon St.	Suite 200	PO Box 17298
Marine, IL 62061	3936 E. Fort Lowell Rd.	Baltimore, MD 21297-1298
	Tucson, AZ 85712-1083	

by depositing a true copy of same, enclosed in a postage paid properly addressed wrapper, in a Belleville City Branch, official depository under the exclusive care and custody of the United States Postal Service, within the State of Illinois.

By: /s/ Rachel Woolever